

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PLATINUMTEL COMMUNICATIONS,)	
LLC,)	
)	
Plaintiff,)	
)	No. 08 CV 1062
vs.)	
)	Judge JOAN H. LEFKOW
ZEFCOM, LLC d/b/a TELISPIRE,)	
TELISPIRE, INC, et al,)	
)	
Defendants.)	

**DEFENDANTS U.S. MOBILE, INC. AND RAMSEY NATOUR’S AMENDED
MOTION TO DISMISS PLATINUMTEL’S FIRST AMENDED COMPLAINT
JOINING DEFENDANTS TELISPIRE AND EZ STREAM**

NOW COMES the Defendants U.S. MOBILE, INC., and RAMSEY NATOUR, individually and d/b/a U.S. Mobile, Quick Com, Quick Com II, Quick Com Cellular Corp., EZ Com, Quick Com Chicago (“U.S. MOBILE and NATOUR”), by and through their attorneys, Thomas F. Courtney & Associates, P.C., and respectfully moves this Court pursuant to Fed. R. Civ. P. 9 and 12 joining Defendants Telispire and EZ Stream to enter an order dismissing with prejudice each of the claims asserted against U.S. MOBILE and NATOUR by plaintiff, PlatinumTel Communications, LLC (“PlatinumTel”) in Count I through V of the Amended Complaint. PlatinumTel’s claims against Defendants should be dismissed because Counts I-V fails to state a claim upon which relief may be granted. In addition, each Count is based upon alleged fraud, and PlatinumTel has failed to plead any of the Count(s) with specificity required under Rule 9(1)(b). In support of this amended motion, Defendants filed a memorandum of law.

WHEREFORE, Defendants, U.S. Mobile and Ramsey Natour, individually, and d/b/a US Mobile, Quick Com, Quick Com II, Quick Com Cellular Corp., EZ Com, Quick Com Chicago respectfully request that Counts I-V of the Amended Complaint be dismissed with prejudice.

Respectfully submitted,

By: s/ Thomas F. Courtney, Jr.
One of its Attorneys

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CERTIFICATE OF SERVICE

I, Thomas F. Courtney, Jr., an attorney, certify that on June 10, 2008, I caused a copy of the foregoing Amended Motion to Dismiss and the accompanying Memorandum to be served by ECF to:

By: s/ Thomas F. Courtney, Jr.

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